



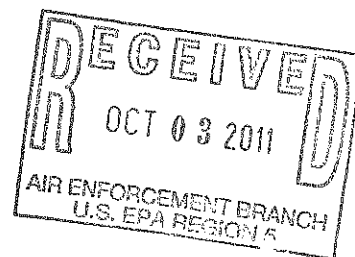
intertape polymer groupTM

Via Fed-Ex Overnight

Ms. Teresa Seidel
District Supervisor
Michigan Department of Environmental Quality
27700 Donald Court
Warren, MI 48092-2793

September 28, 2010

Re: **Semi-Annual Deviation Report 2011**
Intertape Polymer Group
Marysville, MI, 48040 St. Clair County
ROP No. 1997000107a; SRN A6220



Dear Ms. Seidel:

Central Products Company d.b.a. Intertape Polymer Group (IPG) submits the enclosed January 1, 2011 through June 30, 2011 Renewable Operating Permit Report Certification and Renewable Operating Permit Deviation Report. As required for certification. We have forwarded this information to the United States Environmental Protection Agency (USEPA) Region V offices in Chicago as identified below in the copy list.

If you have any questions or concerns, please contact me at (810) 941-6523.

Sincerely,

Ron Englehart
Engineer Manager
Intertape Polymer Group

Attachments: Renewable Operating Permit Report Certification (1 page)
January 1-June 30, 2011 Semi-Annual Deviation Report (1 pages)
POWC MACT Semi-Annual Compliance Report (1/1/11-6/30/11) (3 pages –
cover letter, report certification, semiannual compliance report)
IPG – MACT Deviation Report (6 pages)

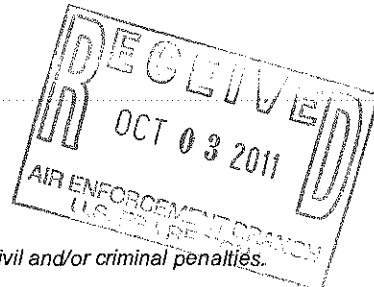
CC: United States Environmental Protection Agency (USEPA)
Air Compliance Data-Michigan
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.



Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating (RO) Permit program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Intertape Polymer Group County St. Clair
Source Address 317 Kendall Avenue City Marysville
AQD Source ID (SRN) A6220 RO Permit No. MI-ROP-A6220-2009 RO Permit Section No. N/A

Please check the appropriate box(es):

☐ **Annual Compliance Certification** (General Condition No. 28 and No. 29 of the RO Permit)

Reporting period (provide inclusive dates): From _____ To _____

- ☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the RO Permit.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the RO Permit, unless otherwise indicated and described on the enclosed deviation report(s).

☒ **Semi-Annual (or More Frequent) Report Certification** (General Condition No. 23 of the RO Permit)

Reporting period (provide inclusive dates): From 01/01/2011 To 06/30/2011

- ☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☐ **Other Report Certification**

Reporting period (provide inclusive dates): From _____ To _____

Additional monitoring reports or other applicable documents required by the RO Permit are attached as described:

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete.

Mike W. Roughton
Name of Responsible Official (print or type)

Ops. Manager
Title

810-941-6370
Phone Number

Signature of Responsible Official

Date

9/28/11



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Intertape Polymer Group County Saint Clair

Source Address 317 Kendall Avenue City Marysville

AQD Source ID (SRN) A6220 ROP No. MI-ROP-A6220-2009 ROP Section No. N/A

ROP Section Contact Ron Englehart Contact Phone No. (810) 941-6523

Reporting Period (provide inclusive dates): From January 1, 2011 to June 30, 2011

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID FGCOATINGPROCESS	2. Condition No. VI.14.b.iv	3. Date(s) of Occurrence 1/14/11	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 2 hour
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation: Line 1 C-1 oven static pressure 3-hour average recorded below operating limit 0.89 (readings of 0.87)	
8. Reason for Deviation and Description of Corrective Action Taken: Coater was in the process of shutting down for a product change over; the C1 oven section stayed in collect while the coater was down causing the deviation. Maintenance repaired the stuck valve before restarting.				

1. Group or Source Wide ID FGCOATINGPROCESS	2. Condition No. III.3.a	3. Date(s) of Occurrence 6/19/11	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 9 hours
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation: RTO 3-hour average fell below 1,400 degrees	
8. Reason for Deviation and Description of Corrective Action Taken: Actuator burner was found to be sticking in the off position causing temperature to fall below the target. Malfunctioning actuator was replaced.				

1. Group or Source Wide ID EUCOMPOUNDING	2. Condition No. VI.2	3. Date(s) of Occurrence 2/5/2011 - 3/21/2011	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 weeks
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation: No recorded static pressures for North & South baghouse filters. Required to record static pressures at least once per week.	
8. Reason for Deviation and Description of Corrective Action Taken: Static pressures were recorded, however the sheets covering this 35 day span cannot be found. Creating a weekly checklist to verify that compliance reporting metrics are complete.				